

EXHIBIT vi

July 2023 Correspondence re ESI Order



Shirley LaVarco <shirley@civilrightscorps.org>

TIME SENSITIVE Response Needed by 5pm Today

1 message

Shirley LaVarco <shirley@civilrightscorps.org>

Tue, Jul 18, 2023 at 12:17 PM

To: Celena Vinson <cvinson@thompsonhorton.com>, Linda Price <lprice@thompsonhorton.com>

Cc: Brittany Francis <brittany@civilrightscorps.org>, Jeff Stein <jeff@civilrightscorps.org>, Cassidy Kristal-Cohen <cassidy@civilrightscorps.org>, Priyanka Shetty <priyanka@civilrightscorps.org>

Hello Celena,

We plan to file the attached ESI protocol by 9am CT tomorrow. Our proposal is designed to minimize discovery disputes and conserve resources for both the parties and the court. We first sent it to you last week and referenced it again in our email to you and Ms. Price yesterday. We will understand that you have no revisions unless we hear otherwise before 5pm today.

Thank you,
Shirley

Shirley LaVarco | Attorney

she/her/hers

(202) 932-1270

Civil Rights Corps

1601 Connecticut Avenue NW, Suite 800

Washington, D.C. 20009

Admitted to practice in the District of Columbia.

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Consent Proposed Order Regarding ESI.docx

21K



Shirley LaVarco <shirley@civilrightscorps.org>

URGENT response needed before 3PM

5 messages

Shirley LaVarco <shirley@civilrightscorps.org>

Fri, Jul 14, 2023 at 3:38 PM

To: Linda Price <lprice@thompsonhorton.com>

Cc: Celena Vinson <cvinson@thompsonhorton.com>, Brittany Francis <brittany@civilrightscorps.org>, Jeff Stein <jeff@civilrightscorps.org>

Hello Linda,

It is my understanding that Celena is out of the office. However, we have a joint filing deadline this evening. We intend to reach out to the court shortly to see whether it will indulge a brief extension. But if it's at all possible to resolve this beforehand, please reach out right away. My number is (202) 932-1270.

Thank you,
Shirley

Shirley LaVarco | Attorney

she/her/hers

(202) 932-1270

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Linda Price <lprice@thompsonhorton.com>

Mon, Jul 17, 2023 at 2:45 PM

To: Shirley LaVarco <shirley@civilrightscorps.org>

Cc: Celena Vinson <cvinson@thompsonhorton.com>, Brittany Francis <brittany@civilrightscorps.org>, Jeff Stein <jeff@civilrightscorps.org>

Ms. LaVarco:

Attached is the Joint Discovery/Case Management Plan with Defendants' edits.

Regards,

Linda Price

Linda Price |
Legal Assistant to Lisa A. Brown, Christopher B. Gilbert,


Celena C. Vinson, Ryan H. Newman, Matthew A. Reed,
and Melissa A. Mihalick

3200 Southwest Freeway, Suite 2000 - Houston, Texas 77027
Main: 713.554.6767 | Direct: 713.554.6755
lprice@thompsonhorton.com | www.thompsonhorton.com



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 **edits - draft joint discovery and case management plan.docx**
38K

Shirley LaVarco <shirley@civilrightscorps.org> Mon, Jul 17, 2023 at 3:41 PM
To: Linda Price <lprice@thompsonhorton.com>
Cc: Celena Vinson <cvinson@thompsonhorton.com>, Brittany Francis <brittany@civilrightscorps.org>, Jeff Stein <jeff@civilrightscorps.org>

Ms. Price,

Thank you for getting this to us. We will incorporate your proposed changes and file this with the court by tomorrow morning. Can you also let us know by end of day if you had any revisions to the proposed ESI protocol that we sent on Wednesday? If not, we'll file that as well.

Best,
Shirley

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2 attachments

 **image001.png**
1K



 **image002.png**
22K

Linda Price <lprice@thompsonhorton.com> Tue, Jul 18, 2023 at 12:39 PM
To: Shirley LaVarco <shirley@civilrightscorps.org>
Cc: Celena Vinson <cvinson@thompsonhorton.com>, Brittany Francis <brittany@civilrightscorps.org>, Jeff Stein <jeff@civilrightscorps.org>

Ms. LaVarco:

Defendants need more time to designate experts after Plaintiff's designation, especially because of the holidays. We would like to push our designation back two weeks, to January 2, 2024, which would move your designation of rebuttal experts back two weeks to January 30, 2024. All other dates are fine. Please let us know if this is agreeable.

Regards,

Linda

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[Quoted text hidden]

[Quoted text hidden]

Linda Price |
Legal Assistant to Lisa A. Brown, Christopher B. Gilbert,

Celena C. Vinson, Ryan H. Newman, Matthew A. Reed,
and Melissa A. Mihalick

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Shirley LaVarco <shirley@civilrightscorps.org>

Tue, Jul 18, 2023 at 1:30 PM

To: Linda Price <lprice@thompsonhorton.com>

Cc: Celena Vinson <cvinson@thompsonhorton.com>, Brittany Francis <brittany@civilrightscorps.org>, Jeff Stein <jeff@civilrightscorps.org>

We certainly understand that and do not object. I'll make those changes before filing.

Best,
Shirley

Shirley LaVarco | Attorney

she/her/hers

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Shirley LaVarco <shirley@civilrightscorps.org>

Proposed Discovery/Case Management Plan—Filing Deadline of 7/14

2 messages

Shirley LaVarco <shirley@civilrightscorps.org>

Wed, Jul 12, 2023 at 2:19 PM

To: Celena Vinson <cvinson@thompsonhorton.com>, Linda Price <lprice@thompsonhorton.com>

Cc: Brittany Francis <brittany@civilrightscorps.org>, Jeff Stein <jeff@civilrightscorps.org>

Dear Counsel,

Please see attached for a draft proposed discovery/case management plan for your review. It must be filed with the court by July 14, 2023. For your convenience, I have highlighted the portions you will need to fill in. Please make any proposed revisions in track changes and/or comments. I have also attached a proposed ESI protocol for your review, designed to minimize discovery disputes and conserve resources for both the parties and the court.

If you disagree with or want to discuss any portions of either draft, please just let us know so we can address before our deadline.

I will follow up with a draft proposed order implementing the discovery plan later today.

Best,
Shirley

Shirley LaVarco | Attorney

she/her/hers

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2 attachments



draft joint discovery and case management plan.docx

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Consent Proposed Order Regarding ESI.docx

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Shirley LaVarco <shirley@civilrightscorps.org>

Wed, Jul 12, 2023 at 9:13 PM

To: Celena Vinson <cvinson@thompsonhorton.com>, Linda Price <lprice@thompsonhorton.com>

Cc: Brittany Francis <brittany@civilrightscorps.org>, Jeff Stein <jeff@civilrightscorps.org>

Celena,

Please see attached for the draft proposed scheduling and docket control order.

Best,
Shirley

Shirley LaVarco | Attorney

she/her/hers

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Proposed Docket Control Order.docx

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